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Date: 12/16/2014 11:54:48 AM

Subject: NACWA report on using the TSD for Nutrients

Attachments: [Final - Review of USEPA Nutrient Permitting Methods\(2\).pdf](#)

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Hi all,

Several months ago, NACWA sent us a report that basically reviewed the TSD (and an early version of our nutrients training) for its use for Nutrient Permitting. We reviewed the report and had a meeting with NACWA to discuss the report. There are many things we agreed with them on and some that we do not/did not. There were some recommendations that we felt we needed more discussion about, and additional expertise in the room.

I'm reaching out to all of you on two particular topics. We've asked NACWA initially to come back and provide further, in depth, discussion on two topics.

1. Recommendation 9 – alternative statistical basis
2. Recommendation 11 – alternative empirical approach to the TSD (re: what happens if a facility demonstrates that their data is not log normally distributed). NACWA presents an alternative method in their document.

Our meetings with NACWA in January and February will basically be listening sessions, to hear what they have to say and present on the two topics above.

So what do I need from all of you? I'm looking for people throughout the office of water (or beyond) who may have statistical or engineering expertise that may help us evaluate these approaches. Please send me suggestions of folks who may be able to be involved in listening to and helping us discuss these topics as NACWA presents them.

I've attached the report for you to review if you're interested in the specifics. Again, We would be focusing on recommendation 9 and 11.

Thanks so much!

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